

REESE LLP

Michael R. Reese

mreese@reesellp.com

George V. Granade

ggranade@reesellp.com

Telephone: (212) 643-0500

Facsimile: (212) 253-4272

HALUNEN LAW

Melissa W. Wolchansky

wolchansky@halunenlaw.com

1650 IDS Center

80 South Eighth Street

Minneapolis, Minnesota 55402

Telephone: (612) 605-4098

Facsimile: (612) 605-4099

Counsel for Plaintiffs and the Proposed Class

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

LESLIE FROHBERG and NANCY
HARDING, on behalf of themselves and all
others similarly situated,

Plaintiffs,

v.

CUMBERLAND PACKING CORP.

Defendant.

No. 1:14-00748-KAM-RLM

**PLAINTIFFS' NOTICE OF MOTION
FOR PRELIMINARY APPROVAL OF
THE CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE THAT, pursuant to Rules 7(b) and 23 of the Federal Rules of Civil Procedure, the undersigned shall bring an unopposed Motion for Preliminary Approval of the Class Settlement before this Court on a date and time to be set by the Court. This motion is based upon all of the files and pleadings in this matter, as well as the Memorandum of Law; the Declaration of Michael R. Reese; the Declaration of Melissa W. Wolchansky; and, the exhibits submitted herewith.

Date: October 9, 2015

Respectfully submitted,

REESE LLP

/s/ Michael R. Reese

Michael R. Reese

mreese@reesellp.com

875 Avenue of the Americas, 18th Floor

New York, New York 10001

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